

Creditor Name:

Krystal Dong

605 E 23rd St APT 2

Oakland CA 94606

Tel: (415)-525-6007

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

Debtor Name:

PG&E CORPORATION, and PACIFIC GAS AND ELECTRIC COMPANY

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

Response to:

NOTICE OF THE REORGANIZED DEBTORS' SIXTH OMNIBUS OBJECTION TO CLAIMS (SATISFIED CLAIMS)

I oppose the disallowance of my claim in the amount of \$3,000 (as attached), filed on 7/16/2019, against the debtors. This claim was filed with supported evidences showing that the debtors did not provide services according to contract and caused significant financial loss to me. The contract stated the service was to be completed in 15-40 weeks, while it did not complete in 18 months (from 12/27/17 to 7/1/19) during which time I had to finance large loans. The claim has NOT been satisfied or released during or prior to these Chapter 11 Cases.

I declare under penalty of perjury that the above statement is true and correct.

Krystal Dong

9/18/20

***CUST PGE 2260 SRF 45825 PackID: 121 MMLID: 5868690 SVC: 6th Omni
Dong, Krystal
605 E 23rd St Apt 2
Oakland CA 94606

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12 *Attorneys for Debtors and Reorganized Debtors*

THE OBJECTION DESCRIBED IN THIS NOTICE ASKS THE COURT TO DISALLOW AND EXPUNGE YOUR CLAIM(S) IDENTIFIED AS "OBJECTED-TO" ON THE FOLLOWING PAGE OF THIS NOTICE.

CLAIMANTS RECEIVING THIS NOTICE SHOULD READ THIS NOTICE CAREFULLY BECAUSE THE OBJECTION MAY AFFECT YOUR RIGHT TO RECEIVE A DISTRIBUTION ON YOUR CLAIM IN THIS CASE.

IF YOU HAVE QUESTIONS, PLEASE CONTACT PRIME CLERK, LLC, AT (844) 339-4217

THE LAST PARAGRAPH OF THIS NOTICE EXPLAINS HOW YOU CAN OBTAIN A COMPLETE COPY OF THE OBJECTION, AT NO COST TO YOU.

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14 UNITED STATES BANKRUPTCY COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 **In re:**

18 **PG&E CORPORATION,**

19 **- and -**

20 **PACIFIC GAS AND ELECTRIC
COMPANY,**

21 **Debtors.**

- 22 ☐ Affects PG&E Corporation
 23 ☐ Affects Pacific Gas and Electric Company
 24 ☒ Affects both Debtors

25 ** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF THE REORGANIZED
DEBTORS' SIXTH OMNIBUS OBJECTION
TO CLAIMS (SATISFIED CLAIMS)**

Response Deadline:
September 29, 2020, 4:00 p.m. (PT)

Hearing Information If Timely Response Made:

Date: October 13, 2020

Time: 10:00 a.m. (Pacific Time)

Place: Telephonic Appearances Only

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

Creditor Name: Dong, Krystal

Objected-To Claim(s)							Basis for Objection
Debtor	Date Filed / Scheduled	Secured	Admin	Priority	General Unsecured	Total Amount	
Pacific Gas and Electric Company	7/16/2019	\$0.00	\$0.00	\$0.00	\$3,000.00	\$3,000.00	Engineerng Advance Claims

On September 3, 2020, PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, the “**Debtors**,” or as reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), filed their *Sixth Omnibus Objection to Claims (Satisfied Claims)* (the “**Omnibus Objection**”) with the United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”). A full copy of the Omnibus Objection may be obtained at no cost, as provided below.

Any Response (as defined below) to the Omnibus Objection must be filed and served upon the Reorganized Debtors’ Counsel by September 29, 2020 (the “Response Deadline”);

Any Response must be accompanied by any declarations or memoranda of law any responding party wishes to present in support of its position;

If there is no timely Response, the Bankruptcy Court may enter an order granting the Omnibus Objection to your Proof(s) of Claim by default.

If you file a timely Response, the Hearing will be held at the date and time shown below. If factual disputes are presented by the Objection and the Response, the Hearing will proceed as a status conference; factual disputes will not be decided at the Hearing, but at a future evidentiary hearing that may be set at the Hearing. Issues of a purely legal nature, where facts are not in dispute, may be decided at the Hearing. See Bankruptcy Local Rule 3007-1.

If you file and serve a timely Response, the date, location and time of the Hearing are:

October 13, 2020 at 10:00 a.m. (Pacific Time)

Courtroom 17, 16th Floor, 450 Golden Gate Ave., San Francisco, CA

The Hearing will be held before the Honorable Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Amended General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, dated March 30, 2020, **the Hearing will be conducted telephonically or by video conference. The courtroom will be closed.** All parties who wish to appear at the Hearing should refer to the Bankruptcy Court’s website, www.canb.uscourts.gov > Rules and Procedures > District Procedures > Policy and Procedure for Appearances by Telephone, for current information about how to appear. Reorganized Debtors’ Counsel will, as a courtesy and on request, provide by email to those who have filed timely Responses updated information regarding how to attend.

These Omnibus Claims Objection Procedures DO NOT APPLY to any proofs of claim with respect to (a) FIRE VICTIM CLAIMS or (b) SUBROGATION WILDFIRE CLAIMS.

BASIS FOR OBJECTION TO YOUR PROOF(S) OF CLAIM: By the Omnibus Objection, the Reorganized Debtors seek to disallow one or more of your Proof(s) of Claim (as defined therein) listed above as "Objected-To Claim(s)" on the grounds that the designated Proof(s) of Claim has been satisfied or released during or prior to these Chapter 11 Cases in accordance with the Bankruptcy Code, any applicable rules, or Court orders. If you do NOT oppose the disallowance of your Objected-To Proof(s) of Claim listed above, then you do NOT need to file a written Response to this Omnibus Objection and you do NOT need to appear at the Hearing. If you do nothing, the Objected-To Claim(s) will be disallowed. To the extent your Proof(s) of Claim relates to protective, unliquidated claims relating to the Reorganized Debtors' potential post-petition non-performance under an assumed agreement, you retain all remedies that would have existed had these Chapter 11 Cases not been filed, and the Reorganized Debtors represent that they will not raise any bankruptcy defenses.

FILING AND SERVICE OF RESPONSE: If you DO oppose the disallowance of your Objected-To Proof(s) of Claim listed above, then you MUST file a response (a "Response"), in writing, with the Bankruptcy Court, and serve it on the counsel for the Reorganized Debtors at PGEclaims@kbkllp.com so as to be received by no later than 4:00 p.m. (Pacific Time) on September 29, 2020 (the "Response Deadline"): You must file the Response through the Court's electronic case filing ("ECF") system if you have access to the ECF system; service on the Reorganized Debtors' Counsel will occur automatically upon ECF filing; and no separate service of your Response is required. If you do NOT have access to the ECF system, service must be made by electronic mail to the email addresses of the Reorganized Debtors' counsel as shown on the Objection, and you must arrange for the Response to be filed with the Court within two business days thereafter. If you do not have the ability to serve a Response electronically, the Response must be served by mail, express or some other means so either (a) it is actually received by the Reorganized Debtors' Counsel by the Response Deadline, or (b) it is dispatched not later than the Response Deadline through a postal or commercial express service that will make actual delivery not more than two business days after the Response Deadline, and in that case the Claimant must inform the Reorganized Debtors' counsel by email, telephone or facsimile before the Response Deadline of the Claimant's name and phone number, the number of the Omnibus Objection, and the fact that a paper Response is being delivered by express.

CONTENTS OF RESPONSE The Response must, at a minimum, include the following: (i) a caption setting forth the name of the Bankruptcy Court, the name of the Reorganized Debtor, the case number and title of the Omnibus Objection to which the Response is directed; (ii) your name, the assigned number(s) of your Proof(s) of Claim, and an explanation for the amount of the Proof(s) of Claim; (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not sustain the Omnibus Objection; (iv) a declaration under penalty of perjury of a person with personal knowledge of the relevant facts that support the Response; (v) your name, address, telephone number, and/or the name, address, and telephone number of your attorney and/or designated representative to whom counsel for the Reorganized Debtors should serve a reply to the Response, if any; and (vi) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on your behalf, if any.

1 If the Bankruptcy Court does not disallow your Objected-To Proof(s) of Claim listed above,
2 then the Reorganized Debtors have the right to object on other grounds to your Proof(s) of Claim at a
later date. You will receive a separate notice of any such objection.

3 **TO GET COPIES OF THE COMPLETE OBJECTION:** Copies of the complete Omnibus
4 Objection and the other pleadings and documents identified herein can be viewed and/or obtained:
5 (i) by accessing the Bankruptcy Court's website at <http://www.canb.uscourts.gov> [PACER account
6 required], (ii) for free by download from on the Reorganized Debtors' approved notice and claim
agent's website at <https://restructuring.primeclerk.com/pge/Home-DocketInfo>, or (iii) by mail, for free,
7 by calling Prime Clerk LLC at (844) 339-4217 (Toll Free) or by email at pgeinfo@primeclerk.com to
request a complete copy of the Omnibus Objection, including all Exhibits.

8 Dated: September 3, 2020

KELLER BENVENUTTI KIM LLP

9 /s/ Peter J. Benvenutti
Peter J. Benvenutti

10 *Attorneys for Debtors and Reorganized Debtors*
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